

RICHARD E. ZUCKERMAN  
Principal Deputy Assistant Attorney General

AMY MATCHISON (CABN 217022)  
Trial Attorney  
United States Department of Justice, Tax Division  
P.O. Box 683, Ben Franklin Station  
Washington, D.C. 20044  
Telephone: (202) 307-6422  
Fax: (202) 307-0054  
E-mail: Amy.T.Matchison@usdoj.gov  
Western.Taxcivil@usdoj.gov

*Attorneys for United States of America*

UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA, ) Case No. 5:18-cv-01633-BLF  
Petitioner, )  
v. )  
FRANCIS BURGA; FRANCIS BURGA AS )  
THE ADMINISTRATOR OF THE ESTATE )  
OF MARGELUS BURGA; and )  
RUSSELL MANSKY, )  
Respondents. )

On May 16, 2019, the United States, respondents Francis Burga (in her individual capacity and as the Administrator of the Estate of Margelus Burga) and Russell Mansky, having previously advised the Court that respondents had provided the Internal Revenue Service (IRS) with revised privilege logs and testimony under oath, pursuant to the Court’s June 5, 2018 Order (Docket No. 19), further advised that both respondents had made efforts to obtain and produce additional summoned material.

Since the parties' last report on April 6, 2020 (Docket No. 54), Ms. Burga has continued to make efforts to obtain summoned material. As previously indicated, Ms. Burga has requested that Peter Meier send her the outstanding summoned material that is in his possession. So far, Ms. Burga has made three productions of documents from Mr. Meier, the most recent of which occurred on June 4, 2020. Mr.

1 Meier has indicated to Ms. Burga's counsel that he will continue producing records although it may take  
2 many months and may be delayed by the current Covid-19 crisis.

3 When these productions are complete, the United States will be able to evaluate whether  
4 respondents have complied with the summonses. Ms. Burga maintains that she has no control over Mr.  
5 Meier's production of documents and contends that she has complied with the summonses and complied  
6 with the Court's Order enforcing the summonses but nevertheless will continue to produce to the IRS  
7 any documents provided by Mr. Meier.

8 Dated this 22nd day of September, 2020

9 RICHARD E. ZUCKERMAN  
10 Principal Deputy Assistant Attorney General

11 /s/ Amy Matchison  
12 AMY MATCHISON (CA SBN 217022)  
13 Trial Attorney, Tax Division  
United States Department of Justice

14 Dated this 22nd day of September, 2020

15 SIDEMAN & BANCROFT LLP

16 By: /s/ Jay R. Weill  
17 Jay R. Weill  
18 Steven M. Katz  
19 Travis W. Thompson  
20 Attorneys for FRANCIS BURGA;  
FRANCIS BURGA AS THE  
ADMINISTRATOR OF THE ESTATE OF  
MARGELUS BURGA

21 Dated this 22nd day of September, 2020

22 WOOD LITIGATION

23 By: /s/ Marissa Major  
24 Marissa Major  
25 Attorney for Respondent RUSSELL  
26 MANSKY

1                   ECF CERTIFICATION

2                   Pursuant to Local Rule 5-1(i)(3), I hereby attest that I obtained concurrence in the filing of  
3 this document from the signatories indicated by the conformed signatures (/s/) of Jay R. Weill and  
4 Marissa Major.

5                   */s/ Amy Matchison*  
6                   AMY MATCHISON  
7                   Trial Attorney, Tax Division  
U.S. Department of Justice